

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA

Henna Cardenas, individually and on	:	Case No.: 9:18-cv-00761-DCN
behalf of all other similarly situated,	:	
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
Spinnaker Resorts, a Florida Corporation,	:	
	:	
Defendant.	:	
	:	

---

**PLAINTIFF'S ANSWER TO RULE 26.01 INTERROGATORIES**

- A. State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

**RESPONSE: Plaintiff is unaware of any entity that may have a subrogation interest in this matter.**

- B. As to each claim, state whether it should be tried by jury or non-jury and why.

**RESPONSE: A jury trial is demanded for each claim presented because all the claims involve an underlying theme of violation of public interest, therefore it should be a jury of peers from the public to make the ultimate decision on the issues in this case.**

- C. State whether the party submitting these responses is a publicly-owned company and separately identify (1) any parent corporation and any publicly held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a parent; and (3) each publicly owned company in which the party owns ten percent (10%) or more of the outstanding shares.

**RESPONSE: The Plaintiff is an individual, not a publicly owned company.**

D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

**RESPONSE: Defendant is headquartered in Hilton Head, SC, which is in this division. Moreover, a substantial part of the events giving rise to Plaintiff's claims occurred in this division.**

E. Is this action related in whole or in part to any matter filed in this District, whether civil or criminal? If so, provide:

1. A short caption and the full case number of the related action;
2. An explanation of how the matters are related; and
3. A statement of the status of the related action.

**RESPONSE: This action is not related to any other matter, civil or criminal in the District of South Carolina.**

I declare under penalty of perjury that the foregoing is true and correct.

*Signed this 19th day of March, 2018.*

PALMETTO STATE LAW

s/Margaret A. Collins  
Margaret A. Collins, Fed. Bar No. 7074 (D.S.)  
2241 Bush River Rd.  
Columbia, SC 29210  
P: (803) 708-7442  
F: (803) 753-9352  
meg@pslawsc.com  
*Attorney for Plaintiff*